

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AMERICAN BROADCASTING  
COMPANIES, INC., DISNEY  
ENTERPRISES, INC., TWENTIETH  
CENTURY FOX FILM CORPORATION,  
CBS BROADCASTING INC., CBS STUDIOS  
INC., FOX TELEVISION STATIONS, LLC,  
FOX BROADCASTING COMPANY, LLC,  
NBCUNIVERSAL MEDIA, LLC,  
UNIVERSAL TELEVISION LLC, AND  
OPEN 4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs,

V.

DAVID R. GOODFRIEND AND SPORTS  
FANS COALITION NY, INC.,

Defendants.

Civil Action No. 19-cv-7136-LLS

**ORAL ARGUMENT REQUESTED**

**NOTICE OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Gerson A. Zweifach, and the exhibits annexed thereto, Plaintiffs American Broadcasting Companies, Inc., Disney Enterprises, Inc., Twentieth Century Fox Film Corporation, CBS Broadcasting Inc., CBS Studios Inc., Fox Television Stations LLC, Fox Broadcasting Company LLC, NBCUniversal Media, LLC, Universal Television LLC, and Open 4 Business Productions, LLC, by and through the undersigned counsel, will move this Court, before the Honorable Louis L. Stanton, United States District Judge, in Courtroom 21C at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, NY 10007, on such day and at such time designated by the Court, for an Order granting partial summary judgment rejecting Defendants' affirmative defense under Section 111(a)(5) of the Copyright Act.

Respectfully submitted,

/s/ Gerson A. Zweifach

Gerson A. Zweifach

Thomas G. Hentoff (*pro hac vice*)

Joseph M. Terry (*pro hac vice*)

Tian Huang (*pro hac vice*)

Jean Ralph Fleurmont (*pro hac vice*)

WILLIAMS & CONNOLLY LLP

725 Twelfth Street,

N.W. Washington, DC

20005

650 Fifth Avenue

Suite 1500

New York, NY 10019

Tel: (202) 434-5000

Fax: (202) 434-5029

gzweifach@wc.com

thentoff@wc.com

jterry@wc.com

thuang@wc.com

jfleurmont@wc.com

*Attorneys for All Plaintiffs*

Paul D. Clement (*pro hac vice*)

Erin E. Murphy (*pro hac vice*)

KIRKLAND & ELLIS LLP

1301 Pennsylvania Avenue,

N.W. Washington, DC 20004

Tel: (202) 389-5000

Fax: (202) 389-5200

paul.clement@kirkland.com

erin.murphy@kirkland.com

*Attorneys for Plaintiffs Fox Television  
Stations, LLC and Fox Broadcasting  
Company, LLC*